REMARKS

This application contains claims 1-34, all of which were rejected in the present Official Action. Reconsideration is respectfully requested.

Applicant thanks Examiners Stork and Hong for the courtesy of a personal interview with Applicant's representative, Sanford T. Colb (Reg. No. 26,856), held in the USPTO on December 15, 2005. At the interview, Mr. Colb argued the patentability of independent claims 1 and 30 over the cited art. The Examiners acknowledged that the grounds of rejection of these claims may be incorrect and agreed to reconsider the issues after submission of a further response by Applicant.

The present response has been prepared accordingly, setting forth the reasons for patentability of claims 1 and 30 in brief. Further details relating to these reasons were presented in Applicant's previous response to the Official Action of July 14.

Claims 1, 2, 12, 13 and 21-23 were rejected under 35 U.S.C. 103(a) over Srivastava et al. (U.S. Patent 6,549,922) in view of Odom et al. (U.S. Patent 5,842,213) and Kwang et al. (U.S. Patent 5,862,327) and further in view of Prezioso (U.S. Patent 5,577,169). Applicant respectfully traverses this rejection.

As explained in Applicant's previous response, claim 1 recites a method for processing data from diverse sources in a selected data domain using a unified schema in order to generate unified data in a markup language. The schema is selected specifically for the domain in question, from among multiple schemata that are specific to particular domains that are listed in the claim: computer system performance evaluation, customer relationship management, healthcare, and telecommunications. In other words, Applicant has implicitly defined the term "domains" to refer to certain global application fields, which are recited explicitly in the claim.

Kwang describes an activity-based system for long-lived transactions between disconnected servers and clients. The term "domain," as used by Kwang, refers to a certain subset of an enterprise database that is used by a particular user in a particular activity. Kwang's "domains" are

all parts of the same database and thus all belong to the same domain in the sense it which the term "domain" is used in the present patent application.

Prezioso describes a fuzzy logic entity behavior profiler, which profiles the behavior of entities with common characteristics. Prezioso uses the word "domain" in the sense of a broad application field, such as the healthcare domain or the retail industry, i.e., in a sense completely different from that used by Kwang. Prezioso, however, does not teach or suggest applying his profiling technique – or any other sort of computational technique – to the domain as a whole. Rather, he profiles specific peer groups within the domain and compares the degree to which an entity within a peer group is or is not associated with a set of behavior characteristics relative to others in the same peer group.

In view of the above points, Applicant respectfully submits that the addition of Prezioso to the previously-cited references (Srivastava, Odom and Kwang) would not have led a person of ordinary skill in the art to the invention recited in claim 1, for a number of reasons:

1) Prezioso performs data analysis not on the healthcare domain, but rather on limited peer groups within the domain. Prezioso neither teaches nor suggests performing domain-wide data analysis.

2) Prezioso does not constitute analogous art to the claimed invention. Claim 1 is directed to a method that maps source data from diverse sources using a schema to generate unified data in a markup language. Prezioso relates to fuzzy analysis of behavior characteristics. He has nothing to do with data mapping, schemata, or markup languages.

3) Prezioso's definition of "domain" is incompatible with Kwang's definition. As noted above, Kwang's system uses "domains" that are activity-specific subsets of an enterprise database that are each accessed by a particular user. Interpolating Prezioso's definition of "domain," meaning a broad application field, into Kwang would render Kwang's system inoperative, since all users would then be in the same domain and would have to use the same schema.

4) Although the Examiner stated in the Advisory Action that "it would have been obvious to one of ordinary skill... to have combined Prezioso with the above mentioned references, since it would have facilitated data analysis," the methods of data analysis described by Prezioso (fuzzy analysis of behavior characteristics) are not applicable to any of the processing tasks described by Srivastava, Odom or Kwang. The person of ordinary skill would have had no expectation of success in combining Prezioso with the other references, and thus no motivation to make such a combination.

Therefore, claim 1 is believed to be patentable over the cited art. Furthermore, as explained in Applicant's previous response, in view of the patentability of claim 1, claims 2-29 are believed to be patentable, as well.

Claims 30-34 were rejected under 35 U.S.C. 103(a) over Srivastava in view of Odom and Kwang and further in view of Sarkar. Applicant respectfully traverses this rejection.

Claim 30 recites a method for processing source data from diverse sources, in which source data are mapped to a markup language responsively to a query in the markup language. The data are mapped from the diverse formats to a unified schema upon receiving the query. In other words, the unified data are created dynamically when required by a particular query, at the time the query is received. This feature of the invention is neither taught nor suggested by the cited art.

As explained in Applicant's previous response, Sarkar neither teaches nor suggests that documents be mapped dynamically from diverse formats to a markup language in response to queries when the queries are received, as required by claim 30. Rather, Sarkar assumes that the documents already exist in XML/RDF before the user submits a query. (See, for example, Sarkar's Fig. 1.) In rejecting claim 30, the Examiner evidently ignored this point.

Thus, Applicant respectfully reiterates that claim 30 is patentable over the cited art, as are claims 31-34.

Applicant believes the remarks presented hereinabove to be fully responsive to all of the grounds of rejection raised by the Examiner. In view of these remarks, Applicant respectfully

submits that all of the claims in the present application are in order for allowance. Notice to this effect is hereby requested.

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Respectfully submitted,

By _____
S. Peter Ludwig
Registration No.: 25,351
DARBY & DARBY P.C.
P.O. Box 5257
New York, New York 10150-5257
(212) 527-7700
(212) 527-7701 (Fax)
Attorneys/Agents For Applicant